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6 Attorneys for Defendants
7 GMAC LLC, CAP RE OF VERMONT, INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11
12 KARAM SINGH BADESCHA, FELICIA
13 FOLMAR, LORI GARRETT, and DONNA
14 MOORE, individually and on behalf of all other
similarly situated,,

15 Plaintiffs,

16 v.
17 GMAC LLC, CAP RE OF VERMONT, INC.,

18 Defendants.

Case No. C06-07817

**REVISED STIPULATION AND
[PROPOSED] ORDER
VACATING CASE DEADLINES**

1 Whereas plaintiffs Karam Singh Badesha, Felicia Folmar, Lori Garrett and Donna Moore
 2 (collectively, "plaintiffs") and defendants GMAC LLC and Cap Re of Vermont, Inc.
 3 (collectively, "defendants") are meeting and conferring in good faith to resolve threshold issues
 4 regarding the initial pleadings in an effort to avoid needless motion practice;

5 Whereas those discussions are ongoing and require the parties to develop and informally
 6 exchange additional factual information;

7 Whereas the parties believe that judicial economy would be better served by postponing
 8 initial disclosures, the case management conference, and responsive pleading deadlines until the
 9 initial pleadings are further settled;

10 Whereas the only previous time modification in this case was to extend the time for
 11 defendants to respond to the complaint from February 15, 2007 to March 30, 2007, because
 12 defendants had been previously represented by different counsel and had only recently retained
 13 their current counsel,

14 Accordingly, the parties, through their respective attorneys, hereby stipulate and request
 15 that the Court enter an order as follows:

16 1. Plaintiffs shall file and serve an amended complaint on or before May 18, 2007;

17 2. Defendants shall file and serve responsive pleadings on or before June 22, 2007;

18 3. If either of the defendants' responses to the amended complaint is a motion, the
 19 parties will meet and confer regarding a briefing schedule on such motion(s) and submit their
 20 proposed schedule to the Court for approval;

21 4. The currently pending deadlines in the case — the initial disclosures deadline on
 22 March 23, 2007, the case management conference on March 30, 2007, and defendants'
 23 responsive pleading deadline to the original complaint on March 30, 2007 — shall be
 24 vacated; the case management conference shall be reset to ~~July 13, 2007~~, at 1:30 p.m.;
 July 27, 2007

25 5. The parties shall exchange initial disclosures on or before June 15, 2007. The
 26 parties shall conduct a Rule 26(f) conference on or before June 29, 2007. The parties shall
 27 submit a joint case management statement meeting the requirements of Local Rule 16-9 on or

1 July 20, 2007
2 before ~~July 6, 2007~~. Nothing in this Order shall be construed to affect the parties' rights to
3 take discovery from parties or nonparties.

4 Dated: March 28, 2007

5 MICHAEL J. AGOGLIA
6 WENDY M. GARBERS
7 RITA F. LIN
8 MORRISON & FOERSTER LLP

9
10 By: /s/ Wendy M. Garbers
11 Wendy M. Garbers

12 Attorneys for Defendants
13 GMAC LLC, CAP RE OF VERMONT,
14 INC.

15 Dated: March 28, 2007

16 ALAN R. PLUTZIK
17 ROBERT M. BRAMSON
18 JOSEPH H. MELTZER
19 EDWARD W. CIOLKO
20 JOSEPH A. WEEDEN
21 SCHIFFRIN & BARROWAY LLP

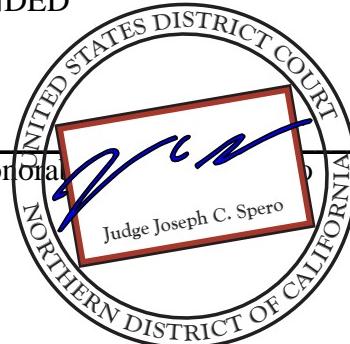
22 By: /s/ Alan R. Plutzik
23 Alan R. Plutzik

24 Attorneys for Plaintiffs

25 **[PROPOSED] ORDER**

26 Pursuant to stipulation, IT IS SO ORDERED AS AMENDED

27 Dated: March 29, 2007



28 **ECF CERTIFICATION**

29 Pursuant to General Order No. 45, § X.B., the filing attorney attests that she has obtained
30 concurrence regarding the filing of this document from the signatory to the document.

31 By: /s/Wendy M. Garbers
32 Wendy M. Garbers